IV. REMARKS

Claims 1-15 are pending in this application. By this amendment, claims 1, 6 and 11 have been amended herein. Applicant does not acquiesce in the correctness of the rejections and reserve the right to present specific arguments regarding any rejected claims not specifically addressed. Furthermore, Applicant reserves the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application. Reconsideration in view of the following remarks is requested.

Claims 6, 8, and 10 are rejected under 35 U.S.C. as being anticipated by Pak et al. (U.S. PG Pub No. 2004/0260534), hereinafter "Pak." Claims 1-5, 7, 9, and 11-5 are rejected under 35 U.S.C. 103(a) as being unpatentable over Pak in view of Chaudhuri (U.S. PG Pub no. 2003/0018615), hereinafter "Chaudhuri."

With respect to independent claim 6, Applicant traverses the rejection because Pak fails to teach or suggest each and every claimed feature, as is required under 35 USC 102(e), and therefore does not anticipate the claimed invention. Specifically, Pak does not, *inter alia*, teach or suggest, "wherein the alternative answer belongs to an alternative answer category determined by inputting a look-up association into an alternative answer probability table, wherein the look-up association is based on a search history table". See amended claim 6.

To the contrary, the portion of the specification of Pak that the Office alleges discloses *portions* of this limitation is found at paragraphs 0027-0028. Office Action,

page 3, item 04. However, the cited section in Pak (and Pak, on whole), discloses a search method for searching a variety of types of documents for material related to concepts expressed in a natural language text. Abstract. In fact, the cited paragraphs (i.e., 0027 and 0028) merely refer to figures 3A and 3B of Pak. Said figures, and the specification describing them, do not disclose or suggest, *inter alia*, any type of alternative answer *probability* table. (emphasis added). The figures merely show a knowledge base 160 that includes material 162, categories 164, and document type 166. Further, the Office never cites what specific elements in Pak even disclose, for example, an alternative answer probability table; an alternative answer; an alternative answer category; a look-up association based on a search history table, and the like. Clearly, Pak does not anticipate the claimed invention. Accordingly, Applicant contends that claim 6, as amended, is in condition for allowance and that the rejection should be withdrawn.

With regard to claim 1 and similarly in claim 11, the claimed invention includes, *inter alia*, "determining a look-up association based on the match answer category and a search history table; inputting the look-up association into an alternative answer probability table to identify an alternative answer category." Applicant submits that the suggested combination does not disclose or suggest this feature.

To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable

expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations." (MPEP 706.02(j)). In this case, Applicant submits that the Office fails to establish a *prima facie* case of obviousness for the reasons stated below.

Pak does not disclose, *inter alia*, the aforementioned feature and Chaudhuri does not remedy the glaring deficiency in Pak. As similarly discussed above regarding claim 6, Pak does not suggest whatsoever any type of alternative answer probability table. The portion of the specification of Pak that the Office alleges discloses this limitation is found at paragraph 0019. In fact, the cited specification section of Pak does not disclose whatsoever any concept of a table, nor an alternative answer probability table. In fact, paragraph 0019 merely provides a summary of the invention of Pak. Curiously, the Office cites this same summarizing paragraph 0019 for also disclosing the "determining" step and "performing" step limitations in claim 1 of the claimed invention. Respectfully, it appears the Office is making wholesale, broad summarizing allegations of teachings in the prior art, without providing specific, cited examples in the cited art. Clearly, Pak and Chaudhuri do not anticipate the claimed invention.

Accordingly, Applicant contends that claims 1 and 11, as amended, are in condition for allowance and that the rejection should be withdrawn.
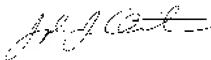
With respect to dependent claims 2-5, 7-10 and 12-15, Applicant submits that these claims are allowable based on their dependency from allowable independent claims.

The dependent claims are also believed to be allowable based for their own additional features.

IV. CONCLUSION

In light of the above remarks, Applicant respectfully submits that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicant's undersigned representative at the number listed below.

Respectfully submitted,

Date: 27 September 2006

_____
Joseph J. Christian
Reg. No.: 51,560

Hoffman, Warnick & D'Alessandro LLC
75 State Street, 14th Floor
Albany, New York 12207
(518) 449-0044